



Lena Andrews <lana.andrews@bncllaw.com>

## Lopez (PC) Mediation Dates

7 messages

**Bakken, Tori** <Tori.Bakken@lewisbrisbois.com>

Thu, May 2, 2024 at 7:01 AM

To: Lena Andrews <lana.andrews@bncllaw.com>

Cc: "Sain, Tony" <Tony.Sain@lewisbrisbois.com>, "McLaughlin, Abigail" <Abigail.McLaughlin@lewisbrisbois.com>, Irvin Aguirre <irvin.aguirre@bncllaw.com>, Julia Quesada <julia.quesada@bncllaw.com>, DeWitt Lacy <dewitt@bncllaw.com>, "Medina, Christina" <Christina.Medina@lewisbrisbois.com>, "Arabyan, Lilit" <Lilit.Arabyan@lewisbrisbois.com>

Good Morning Lena,

Please be patient, getting additional dates requires coordinating multiple schedules. If those May dates don't work, we will likely be looking at late July. I will get those available dates to you once confirmed.

Thanks,

Tori



**Tori L. N. Bakken**  
Attorney  
Tori.Bakken@lewisbrisbois.com

T: 213.680.5172 F: 213.250.7900

633 W. 5th Street, Suite 4000, Los Angeles, CA 90071 | [LewisBrisbois.com](https://www.lewisbrisbois.com)

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**From:** Lena Andrews <lana.andrews@bncllaw.com>

**Sent:** Wednesday, May 1, 2024 12:15 PM

**To:** Bakken, Tori <Tori.Bakken@lewisbrisbois.com>

**Cc:** Sain, Tony <Tony.Sain@lewisbrisbois.com>; McLaughlin, Abigail <Abigail.McLaughlin@lewisbrisbois.com>; Gregg Audet <gaudet@anaheim.net>; Fox (LA), Dana <Dana.Fox@lewisbrisbois.com>; Irvin Aguirre <irvin.aguirre@bncllaw.com>; Julia Quesada <julia.quesada@bncllaw.com>; DeWitt Lacy <dewitt@bncllaw.com>; Medina, Christina <Christina.Medina@lewisbrisbois.com>

**Subject:** Re: [EXT] Re: [PC] Re: Lopez et al v City of Anaheim et al - Request to Meet and Confer re Modification of the Scheduling Order

Good morning:

I am following up on the trial date and a date for the rescheduled mediation. Please advise.

Regards,

Lena P. Andrews

*Attorney*

\_\_\_\_\_

Burris, Nisenbaum, Curry and Lacy LLP

9701 Wilshire Blvd., Suite 1000

Beverly Hills, CA 90212

Telephone: (310) 601-7070

Facsimile: (510) 839-3882

Website: [www.johnburrislaw.com](http://www.johnburrislaw.com)

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On Tue, Apr 30, 2024 at 3:56 PM Lena Andrews <[lena.andrews@bncllaw.com](mailto:lena.andrews@bncllaw.com)> wrote:

May 15 will not work and May 17 is not ideal. Do you have any other availability in late May?

Regards,

Lena P. Andrews

*Attorney*

[Redacted Signature]

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On Tue, Apr 30, 2024 at 1:13 PM Bakken, Tori <[Tori.Bakken@lewisbrisbois.com](mailto:Tori.Bakken@lewisbrisbois.com)> wrote:

We can do May 15 or May 17, but the 15<sup>th</sup> is preferable.



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**From:** Lena Andrews <[lena.andrews@bncllaw.com](mailto:lena.andrews@bncllaw.com)>  
**Sent:** Tuesday, April 30, 2024 12:28 PM  
**To:** Bakken, Tori <[Tori.Bakken@lewisbrisbois.com](mailto:Tori.Bakken@lewisbrisbois.com)>  
**Cc:** Sain, Tony <[Tony.Sain@lewisbrisbois.com](mailto:Tony.Sain@lewisbrisbois.com)>; McLaughlin, Abigail <[Abigail.McLaughlin@lewisbrisbois.com](mailto:Abigail.McLaughlin@lewisbrisbois.com)>; Gregg Audet <[gaudet@anaheim.net](mailto:gaudet@anaheim.net)>; Fox (LA), Dana <[Dana.Fox@lewisbrisbois.com](mailto:Dana.Fox@lewisbrisbois.com)>; Irvin Aguirre <[irvin.aguirre@bncllaw.com](mailto:irvin.aguirre@bncllaw.com)>; Julia Quesada <[julia.quesada@bncllaw.com](mailto:julia.quesada@bncllaw.com)>; DeWitt Lacy <[dewitt@bncllaw.com](mailto:dewitt@bncllaw.com)>; Medina, Christina <[Christina.Medina@lewisbrisbois.com](mailto:Christina.Medina@lewisbrisbois.com)>  
**Subject:** Re: [EXT] Re: [PC] Re: Lopez et al v City of Anaheim et al - Request to Meet and Confer re Modification of the Scheduling Order

In addition, Judge Biderman has requested that we send him some requested dates for the mediation that are at least 2 weeks out. Could you please provide some dates that work for you?

Regards,

Lena P. Andrews

*Attorney*

[Redacted Signature]

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On Apr 30, 2024, at 11:47 AM, Lena Andrews <[lena.andrews@bncllaw.com](mailto:lena.andrews@bncllaw.com)> wrote:

Counsel:

We can agree to a June 2025 trial date. You had stated you were available June 19-27; however June 19 is a Thursday so that will not work as a start date.

Can you be available to start on June 24?

Regards,

Lena P. Andrews

*Attorney*

[Redacted Signature]

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On Tue, Apr 30, 2024 at 11:27 AM Lena Andrews <[lena.andrews@bnclaw.com](mailto:lena.andrews@bnclaw.com)> wrote:


Please hold the June dates. I will confirm with my clients and we should be able to get this stipulation finalized by tomorrow.

I have also reached out to Judge Biderman for his availability so that we can reschedule the mediation.

Regards,

Lena P. Andrews

*Attorney*

 Image removed by sender.

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On Fri, Apr 26, 2024 at 3:40 PM Bakken, Tori <[Tori.Bakken@lewisbrisbois.com](mailto:Tori.Bakken@lewisbrisbois.com)> wrote:

Good Afternoon Lena,

If we are going to continue the trial date in this matter, based on defense counsel availability, we would need to push it out to June 19-June 27 of next year. Unfortunately, that is the soonest option we have available, but if that does not work, we can offer additional options after that date. Please let us know as soon as possible, as we cannot guarantee this option will remain available.

As to the mediator, yes we would like to still use Judge Biderman.

Thanks,

Tori

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**Tori L. N. Bakken**  
**Attorney**  
[Tori.Bakken@lewisbrisbois.com](mailto:Tori.Bakken@lewisbrisbois.com)



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**From:** Lena Andrews <[lena.andrews@bnclaw.com](mailto:lena.andrews@bnclaw.com)>

**Sent:** Friday, April 26, 2024 1:07 PM

**To:** Sain, Tony <[Tony.Sain@lewisbrisbois.com](mailto:Tony.Sain@lewisbrisbois.com)>

**Cc:** McLaughlin, Abigail <[Abigail.McLaughlin@lewisbrisbois.com](mailto:Abigail.McLaughlin@lewisbrisbois.com)>; Gregg Audet <[gaudet@anaheim.net](mailto:gaudet@anaheim.net)>; Bakken, Tori <[Tori.Bakken@lewisbrisbois.com](mailto:Tori.Bakken@lewisbrisbois.com)>; Fox (LA), Dana <[Dana.Fox@lewisbrisbois.com](mailto:Dana.Fox@lewisbrisbois.com)>; Irvin Aguirre <[irvin.aguirre@bnclaw.com](mailto:irvin.aguirre@bnclaw.com)>; Julia Quesada <[julia.quesada@bnclaw.com](mailto:julia.quesada@bnclaw.com)>; DeWitt Lacy <[dewitt@bnclaw.com](mailto:dewitt@bnclaw.com)>; Medina, Christina <[Christina.Medina@lewisbrisbois.com](mailto:Christina.Medina@lewisbrisbois.com)>

**Subject:** [EXT] Re: [PC] Re: Lopez et al v City of Anaheim et al - Request to Meet and Confer re Modification of the Scheduling Order

As stated in my previous email, we are happy to consider alternative dates.

Re the mediation: Are you still amenable to Judge Biderman? If so, I will inquire as to his upcoming availability.

Regards,

Lena P. Andrews

*Attorney*

<~WRD0000.jpg>

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On Fri, Apr 26, 2024 at 11:56 AM Sain, Tony <[Tony.Sain@lewisbrisbois.com](mailto:Tony.Sain@lewisbrisbois.com)> wrote:

Dear Counsel:

The current stipulation does not work for defendants. Ms. McLaughlin is trying to find a defense-workable alternative. However, as she previously advised, that requires a lot of scheduling coordination, since you also want to move the trial date.

Additionally, defendants cannot agree to any continuances unless and until the mediation has been rescheduled.

Ms. McLaughlin will get back to you as soon as feasible. Thanks!

Respectfully,

Tony M. Sain, Esq., Partner Of

**LEWIS, BRISBOIS, BISGAARD & SMITH LLP**

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Los Angeles, CA 90071

213.250.1800 (main)

[Tony.Sain@lewisbrisbois.com](mailto:Tony.Sain@lewisbrisbois.com)

<https://lewisbrisbois.com/attorneys/sain-tony-m>

---

**From:** Lena Andrews <[lena.andrews@bncllaw.com](mailto:lena.andrews@bncllaw.com)>

**Sent:** Friday, April 26, 2024 11:20 AM

**To:** McLaughlin, Abigail <[Abigail.McLaughlin@lewisbrisbois.com](mailto:Abigail.McLaughlin@lewisbrisbois.com)>

**Cc:** Gregg Audet <[gaudet@anaheim.net](mailto:gaudet@anaheim.net)>; Bakken, Tori <[Tori.Bakken@lewisbrisbois.com](mailto:Tori.Bakken@lewisbrisbois.com)>; Fox (LA), Dana <[Dana.Fox@lewisbrisbois.com](mailto:Dana.Fox@lewisbrisbois.com)>; Sain, Tony <[Tony.Sain@lewisbrisbois.com](mailto:Tony.Sain@lewisbrisbois.com)>; Irvin Aguirre <[irvin.aguirre@bncllaw.com](mailto:irvin.aguirre@bncllaw.com)>; Julia Quesada <[julia.quesada@bncllaw.com](mailto:julia.quesada@bncllaw.com)>; DeWitt Lacy <[dewitt@bncllaw.com](mailto:dewitt@bncllaw.com)>

**Subject:** Re: [EXT] Re: Lopez et al v City of Anaheim et al - Request to Meet and Confer re Modification of the Scheduling Order

Good morning;

I am following up on Defendants' position on the stipulation. Please advise.

Regards,

Lena P. Andrews

*Attorney*

<~WRD0000.jpg>

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On Tue, Apr 23, 2024 at 8:13 PM Lena Andrews <[lena.andrews@bncllaw.com](mailto:lena.andrews@bncllaw.com)> wrote:

Ms. McLaughlin:

A draft stipulation is attached. The dates reflect a 60 day continuance. If the proposed trial date does not work for your office, please suggest alternative dates and we would be happy to consider them.

Please use track changes for any suggested revisions.

Regards,

Lena P. Andrews

*Attorney*

<~WRD0000.jpg>

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On Mon, Apr 22, 2024 at 11:58 AM McLaughlin, Abigail <[Abigail.McLaughlin@lewisbrisbois.com](mailto:Abigail.McLaughlin@lewisbrisbois.com)> wrote:

Ms. Andrews:

As you know, counsel on this matter are also currently engaged in trial on the Nunis matter. We are discussing the continuance and will get back to you as soon as we can, given the May 10, 2024 fact discovery cut-off. It may be easier to assess if you could circulate a stipulation with proposed dates – that way we are able to see if such comports with our trial schedule in other matters.

Thank you,

Abigail

<image001.png>

**Abigail J. R. McLaughlin (She/Her/Hers)**

**Partner**

**[Abigail.McLaughlin@lewisbrisbois.com](mailto:Abigail.McLaughlin@lewisbrisbois.com)**

**T: 213.358.6001 F: 213.250.7900**

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**From:** Lena Andrews <[lena.andrews@bncllaw.com](mailto:lena.andrews@bncllaw.com)>

**Sent:** Monday, April 22, 2024 11:53 AM

**To:** Gregg Audet <[gaudet@anaheim.net](mailto:gaudet@anaheim.net)>; Bakken, Tori <[Tori.Bakken@lewisbrisbois.com](mailto:Tori.Bakken@lewisbrisbois.com)>; Fox (LA), Dana <[Dana.Fox@lewisbrisbois.com](mailto:Dana.Fox@lewisbrisbois.com)>; McLaughlin, Abigail <[Abigail.McLaughlin@lewisbrisbois.com](mailto:Abigail.McLaughlin@lewisbrisbois.com)>; Sain, Tony <[Tony.Sain@lewisbrisbois.com](mailto:Tony.Sain@lewisbrisbois.com)>

**Cc:** Irvin Aguirre <[irvin.aguirre@bncllaw.com](mailto:irvin.aguirre@bncllaw.com)>; Julia Quesada <[julia.quesada@bncllaw.com](mailto:julia.quesada@bncllaw.com)>; DeWitt Lacy <[dewitt@bncllaw.com](mailto:dewitt@bncllaw.com)>

**Subject:** [EXT] Re: Lopez et al v City of Anaheim et al - Request to Meet and Confer re Modification of the Scheduling Order

Counsel:

I am following up on my email from Thursday. Please advise as to your position on a stipulation to continue.

Regards,

Lena P. Andrews

*Attorney*

<~WRD0000.jpg>

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On Apr 18, 2024, at 12:04 PM, Lena Andrews <[lena.andrews@bncllaw.com](mailto:lena.andrews@bncllaw.com)> wrote:

Counsel:

I am writing to request that we meet and confer regarding a stipulation to modify the scheduling order in the *Lopez* matter.

As you well know, the Nunis trial is currently ongoing and will last until at least the beginning of May with jury deliberations. Currently, the fact discovery cutoff for Lopez is May 10, 2024. As you know, we previously had a mediation scheduled but due to obligations with her employer, Plaintiffs were not able to attend. Plaintiffs remain interested in engaging in additional settlement discussions and I believe it would be prudent to extend all deadlines in this matter to allow for additional time for those settlement discussions prior to the parties expending additional costs on the case in taking more depositions and hiring experts.

Furthermore, the current trial date in this case (September 17, 2024), ordered by the Court in response to Defendants' Motion to Continue, conflicts with a trial in another matter that was set prior to the Court's order in this matter. That trial is very likely to move forward, necessitating a continuance of this trial.

We would request a sixty day continuance of all deadlines to allow time for the parties to find a mutually convenient date for a mediation and to address the conflict with the trial date. Please advise if you are willing to stipulate to a continuance and I will prepare a stipulation.

Thank you in advance for your anticipated professional courtesies.

Regards,

Lena P. Andrews

*Attorney*

<~WRD0000.jpg>

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**Bakken, Tori** <Tori.Bakken@lewisbrisbois.com>

Thu, May 2, 2024 at 10:28 AM

To: Lena Andrews <lena.andrews@bncllaw.com>

Cc: "Sain, Tony" <Tony.Sain@lewisbrisbois.com>, "McLaughlin, Abigail" <Abigail.McLaughlin@lewisbrisbois.com>, Irvin Aguirre <irvin.aguirre@bncllaw.com>, Gregg Audet <GAudet@anaheim.net>, Julia Quesada <julia.quesada@bncllaw.com>, DeWitt Lacy <dewitt@bncllaw.com>, "Medina, Christina" <Christina.Medina@lewisbrisbois.com>, "Arabyan, Lilit" <Lilit.Arabyan@lewisbrisbois.com>

Good Morning Counsel,

I know you've stated that 5/17 is not *ideal*, however after speaking with our client, that option (and 5/15, which you've already stated is not workable on your end) are the only options that work for us. We do not have authority to continue any dates/deadlines until the mediation has occurred, so we would like to get this back on calendar ASAP.

Please confirm by EOD tomorrow (5/3) that you can make this option work.

Thank you,

Tori



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[Quoted text hidden]

---

**Bakken, Tori** <[Tori.Bakken@lewisbrisbois.com](mailto:Tori.Bakken@lewisbrisbois.com)> Thu, May 2, 2024 at 12:08 PM  
To: Lena Andrews <[lena.andrews@bncllaw.com](mailto:lena.andrews@bncllaw.com)>  
Cc: "Sain, Tony" <[Tony.Sain@lewisbrisbois.com](mailto:Tony.Sain@lewisbrisbois.com)>, "McLaughlin, Abigail" <[Abigail.McLaughlin@lewisbrisbois.com](mailto:Abigail.McLaughlin@lewisbrisbois.com)>, Irvin Aguirre <[irvin.aguirre@bncllaw.com](mailto:irvin.aguirre@bncllaw.com)>, Gregg Audet <[GAudet@anaheim.net](mailto:GAudet@anaheim.net)>, Julia Quesada <[julia.quesada@bncllaw.com](mailto:julia.quesada@bncllaw.com)>, DeWitt Lacy <[dewitt@bncllaw.com](mailto:dewitt@bncllaw.com)>, "Medina, Christina" <[Christina.Medina@lewisbrisbois.com](mailto:Christina.Medina@lewisbrisbois.com)>, "Arabyan, Lilit" <[Lilit.Arabyan@lewisbrisbois.com](mailto:Lilit.Arabyan@lewisbrisbois.com)>

Good Afternoon,

In follow up to the below, we've since contacted Judge Biderman, and the 17<sup>th</sup> does not work for him. However, he can make the 13<sup>th</sup> or 14<sup>th</sup> of this month work. Would either of those work for you for a Zoom mediation?

Thanks,

Tori



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**Sent:** Thursday, May 2, 2024 10:28 AM  
**To:** Lena Andrews <[lena.andrews@bncllaw.com](mailto:lena.andrews@bncllaw.com)>

**Cc:** Sain, Tony <Tony.Sain@lewisbrisbois.com>; McLaughlin, Abigail <Abigail.McLaughlin@lewisbrisbois.com>; Irvin Aguirre <irvin.aguirre@bncllaw.com>; Gregg Audet <GAudet@anaheim.net>; Julia Quesada <julia.quesada@bncllaw.com>; DeWitt Lacy <dewitt@bncllaw.com>; Medina, Christina <Christina.Medina@lewisbrisbois.com>; Arabyan, Lilit <Lilit.Arabyan@lewisbrisbois.com>  
**Subject:** RE: Lopez (PC) Mediation Dates

Good Morning Counsel,

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Please confirm by EOD tomorrow (5/3) that you can make this option work.

Thank you,

Tori

**Tori L. N. Bakken**

**Attorney**  
Los Angeles  
213.680.5172 or x2135172

[Quoted text hidden]

---

**Lena Andrews** <lena.andrews@bncllaw.com> Thu, May 2, 2024 at 1:16 PM  
To: "Bakken, Tori" <Tori.Bakken@lewisbrisbois.com>  
Cc: "Sain, Tony" <Tony.Sain@lewisbrisbois.com>, "McLaughlin, Abigail" <Abigail.McLaughlin@lewisbrisbois.com>, Irvin Aguirre <irvin.aguirre@bncllaw.com>, Gregg Audet <GAudet@anaheim.net>, Julia Quesada <julia.quesada@bncllaw.com>, DeWitt Lacy <dewitt@bncllaw.com>, "Medina, Christina" <Christina.Medina@lewisbrisbois.com>, "Arabyan, Lilit" <Lilit.Arabyan@lewisbrisbois.com>

We can be available on May 14. I will get in touch with Judge Biderman to get it scheduled.

Regards,

Lena P. Andrews  
*Attorney*



**Burris, Nisenbaum, Curry and Lacy LLP**

9701 Wilshire Blvd., Suite 1000  
Beverly Hills, CA 90212  
Telephone: (310) 601-7070  
Facsimile: (510) 839-3882  
Website: [www.johnburrislaw.com](http://www.johnburrislaw.com)

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---

**Bakken, Tori** <Tori.Bakken@lewisbrisbois.com> Thu, May 2, 2024 at 1:23 PM  
To: Lena Andrews <lena.andrews@bncllaw.com>  
Cc: "Sain, Tony" <Tony.Sain@lewisbrisbois.com>, "McLaughlin, Abigail" <Abigail.McLaughlin@lewisbrisbois.com>, Irvin Aguirre <irvin.aguirre@bncllaw.com>, Gregg Audet <GAudet@anaheim.net>, Julia Quesada <julia.quesada@bncllaw.com>, DeWitt Lacy <dewitt@bncllaw.com>, "Medina, Christina" <Christina.Medina@lewisbrisbois.com>, "Arabyan, Lilit" <Lilit.Arabyan@lewisbrisbois.com>

Great, we will hold this date open awaiting confirmation details.

Thanks,

Tori





**Tori L. N. Bakken**  
**Attorney**  
[Tori.Bakken@lewisbrisbois.com](mailto:Tori.Bakken@lewisbrisbois.com)  
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---

**From:** Lena Andrews <[lena.andrews@bncllaw.com](mailto:lena.andrews@bncllaw.com)>  
**Sent:** Thursday, May 2, 2024 1:17 PM  
**To:** Bakken, Tori <[Tori.Bakken@lewisbrisbois.com](mailto:Tori.Bakken@lewisbrisbois.com)>  
**Cc:** Sain, Tony <[Tony.Sain@lewisbrisbois.com](mailto:Tony.Sain@lewisbrisbois.com)>; McLaughlin, Abigail <[Abigail.McLaughlin@lewisbrisbois.com](mailto:Abigail.McLaughlin@lewisbrisbois.com)>; Irvin Aguirre <[irvin.aguirre@bncllaw.com](mailto:irvin.aguirre@bncllaw.com)>; Gregg Audet <[GAudet@anaheim.net](mailto:GAudet@anaheim.net)>; Julia Quesada <[julia.quesada@bncllaw.com](mailto:julia.quesada@bncllaw.com)>; DeWitt Lacy <[dewitt@bncllaw.com](mailto:dewitt@bncllaw.com)>; Medina, Christina <[Christina.Medina@lewisbrisbois.com](mailto:Christina.Medina@lewisbrisbois.com)>; Arabyan, Lilit <[Lilit.Arabyan@lewisbrisbois.com](mailto:Lilit.Arabyan@lewisbrisbois.com)>  
**Subject:** [EXT] Re: Lopez (PC) Mediation Dates

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Regards,

Lena P. Andrews

*Attorney*

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**Burris, Nisenbaum, Curry and Lacy LLP**

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**Sent:** Thursday, May 2, 2024 10:28 AM  
**To:** Lena Andrews <[lena.andrews@bncllaw.com](mailto:lena.andrews@bncllaw.com)>  
**Cc:** Sain, Tony <[Tony.Sain@lewisbrisbois.com](mailto:Tony.Sain@lewisbrisbois.com)>; McLaughlin, Abigail <[Abigail.McLaughlin@lewisbrisbois.com](mailto:Abigail.McLaughlin@lewisbrisbois.com)>; Irvin Aguirre <[irvin.aguirre@bncllaw.com](mailto:irvin.aguirre@bncllaw.com)>; Gregg Audet <[GAudet@anaheim.net](mailto:GAudet@anaheim.net)>; Julia Quesada <[julia.quesada@bncllaw.com](mailto:julia.quesada@bncllaw.com)>; DeWitt Lacy <[dewitt@bncllaw.com](mailto:dewitt@bncllaw.com)>; Medina, Christina <[Christina.Medina@lewisbrisbois.com](mailto:Christina.Medina@lewisbrisbois.com)>; Arabyan, Lilit <[Lilit.Arabyan@lewisbrisbois.com](mailto:Lilit.Arabyan@lewisbrisbois.com)>  
**Subject:** RE: Lopez (PC) Mediation Dates

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**Tori L. N. Bakken**  
**Attorney**  
Los Angeles  
213.680.5172 or x2135172

---

**From:** Bakken, Tori <[Tori.Bakken@lewisbrisbois.com](mailto:Tori.Bakken@lewisbrisbois.com)>  
**Sent:** Thursday, May 2, 2024 7:02 AM  
**To:** Lena Andrews <[lena.andrews@bncllaw.com](mailto:lena.andrews@bncllaw.com)>  
**Cc:** Sain, Tony <[Tony.Sain@lewisbrisbois.com](mailto:Tony.Sain@lewisbrisbois.com)>; McLaughlin, Abigail <[Abigail.McLaughlin@lewisbrisbois.com](mailto:Abigail.McLaughlin@lewisbrisbois.com)>; Irvin Aguirre <[irvin.aguirre@bncllaw.com](mailto:irvin.aguirre@bncllaw.com)>; Julia Quesada <[julia.quesada@bncllaw.com](mailto:julia.quesada@bncllaw.com)>; DeWitt Lacy <[dewitt@bncllaw.com](mailto:dewitt@bncllaw.com)>; Medina, Christina <[Christina.Medina@lewisbrisbois.com](mailto:Christina.Medina@lewisbrisbois.com)>; Arabyan, Lilit <[Lilit.Arabyan@lewisbrisbois.com](mailto:Lilit.Arabyan@lewisbrisbois.com)>  
**Subject:** Lopez (PC) Mediation Dates

Good Morning Lena,

Please be patient, getting additional dates requires coordinating multiple schedules. If those May dates don't work, we will likely be looking at late July. I will get those available dates to you once confirmed.

Thanks,

Tori



Tori L. N. Bakken  
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**From:** Lena Andrews <[lena.andrews@bncllaw.com](mailto:lena.andrews@bncllaw.com)>  
**Sent:** Wednesday, May 1, 2024 12:15 PM  
**To:** Bakken, Tori <[Tori.Bakken@lewisbrisbois.com](mailto:Tori.Bakken@lewisbrisbois.com)>  
**Cc:** Sain, Tony <[Tony.Sain@lewisbrisbois.com](mailto:Tony.Sain@lewisbrisbois.com)>; McLaughlin, Abigail <[Abigail.McLaughlin@lewisbrisbois.com](mailto:Abigail.McLaughlin@lewisbrisbois.com)>; Gregg Audet <[gaudet@anaheim.net](mailto:gaudet@anaheim.net)>; Fox (LA), Dana <[Dana.Fox@lewisbrisbois.com](mailto:Dana.Fox@lewisbrisbois.com)>; Irvin Aguirre <[irvin.aguirre@bncllaw.com](mailto:irvin.aguirre@bncllaw.com)>; Julia Quesada <[julia.quesada@bncllaw.com](mailto:julia.quesada@bncllaw.com)>; DeWitt Lacy <[dewitt@bncllaw.com](mailto:dewitt@bncllaw.com)>; Medina, Christina <[Christina.Medina@lewisbrisbois.com](mailto:Christina.Medina@lewisbrisbois.com)>  
**Subject:** Re: [EXT] Re: [PC] Re: Lopez et al v City of Anaheim et al - Request to Meet and Confer re Modification of the Scheduling Order

Good morning:

I am following up on the trial date and a date for the rescheduled mediation. Please advise.

Regards,

Lena P. Andrews

*Attorney*

\_\_\_\_\_

Burris, Nisenbaum, Curry and Lacy LLP

9701 Wilshire Blvd., Suite 1000

Beverly Hills, CA 90212

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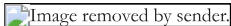
On Tue, Apr 30, 2024 at 3:56 PM Lena Andrews <[lena.andrews@bncllaw.com](mailto:lena.andrews@bncllaw.com)> wrote:

May 15 will not work and May 17 is not ideal. Do you have any other availability in late May?

Regards,

Lena P. Andrews

*Attorney*



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On Tue, Apr 30, 2024 at 1:13 PM Bakken, Tori <[Tori.Bakken@lewisbrisbois.com](mailto:Tori.Bakken@lewisbrisbois.com)> wrote:

We can do May 15 or May 17, but the 15<sup>th</sup> is preferable.



Tori L. N. Bakken  
Attorney  
[Tori.Bakken@lewisbrisbois.com](mailto:Tori.Bakken@lewisbrisbois.com)  
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**Sent:** Tuesday, April 30, 2024 12:28 PM

**To:** Bakken, Tori <[Tori.Bakken@lewisbrisbois.com](mailto:Tori.Bakken@lewisbrisbois.com)>

**Cc:** Sain, Tony <[Tony.Sain@lewisbrisbois.com](mailto:Tony.Sain@lewisbrisbois.com)>; McLaughlin, Abigail <[Abigail.McLaughlin@lewisbrisbois.com](mailto:Abigail.McLaughlin@lewisbrisbois.com)>; Gregg Audet <[gaudet@anaheim.net](mailto:gaudet@anaheim.net)>; Fox (LA), Dana <[Dana.Fox@lewisbrisbois.com](mailto:Dana.Fox@lewisbrisbois.com)>; Irvin Aguirre <[irvin.aguirre@bncllaw.com](mailto:irvin.aguirre@bncllaw.com)>; Julia Quesada <[julia.quesada@bncllaw.com](mailto:julia.quesada@bncllaw.com)>; DeWitt Lacy <[dewitt@bncllaw.com](mailto:dewitt@bncllaw.com)>; Medina, Christina <[Christina.Medina@lewisbrisbois.com](mailto:Christina.Medina@lewisbrisbois.com)>


**Subject:** Re: [EXT] Re: [PC] Re: Lopez et al v City of Anaheim et al - Request to Meet and Confer re Modification of the Scheduling Order

In addition, Judge Biderman has requested that we send him some requested dates for the mediation that are at least 2 weeks out. Could you please provide some dates that work for you?

Regards,

Lena P. Andrews

*Attorney*

 Image removed by sender.

**Burris, Nisenbaum, Curry and Lacy LLP**

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Beverly Hills, CA 90212

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On Apr 30, 2024, at 11:47 AM, Lena Andrews <[lena.andrews@bncllaw.com](mailto:lena.andrews@bncllaw.com)> wrote:

Counsel:


We can agree to a June 2025 trial date. You had stated you were available June 19-27; however June 19 is a Thursday so that will not work as a start date.

Can you be available to start on June 24?

Regards,

Lena P. Andrews

*Attorney*

  
**Burris, Nisenbaum, Curry and Lacy LLP**

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Beverly Hills, CA 90212

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On Tue, Apr 30, 2024 at 11:27 AM Lena Andrews <[lena.andrews@bncllaw.com](mailto:lena.andrews@bncllaw.com)> wrote:

Please hold the June dates. I will confirm with my clients and we should be able to get this stipulation finalized by tomorrow.

I have also reached out to Judge Biderman for his availability so that we can reschedule the mediation.

Regards,

Lena P. Andrews

*Attorney*



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On Fri, Apr 26, 2024 at 3:40 PM Bakken, Tori <[Tori.Bakken@lewisbrisbois.com](mailto:Tori.Bakken@lewisbrisbois.com)> wrote:

Good Afternoon Lena,

If we are going to continue the trial date in this matter, based on defense counsel availability, we would need to push it out to June 19-June 27 of next year. Unfortunately, that is the soonest option we have available, but if that does not work, we can offer additional options after that date. Please let us know as soon as possible, as we cannot guarantee this option will remain available.

As to the mediator, yes we would like to still use Judge Biderman.

Thanks,

Tori

<Logo\_e6253148-26a1-47a9-b861-6ac0ff0bc3c4.png>

**Tori L. N. Bakken**  
**Attorney**  
[Tori.Bakken@lewisbrisbois.com](mailto:Tori.Bakken@lewisbrisbois.com)  
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**From:** Lena Andrews <[lena.andrews@bnclaw.com](mailto:lena.andrews@bnclaw.com)>  
**Sent:** Friday, April 26, 2024 1:07 PM  
**To:** Sain, Tony <[Tony.Sain@lewisbrisbois.com](mailto:Tony.Sain@lewisbrisbois.com)>

**Cc:** McLaughlin, Abigail <Abigail.McLaughlin@lewisbrisbois.com>; Gregg Audet <gaudet@anaheim.net>; Bakken, Tori <Tori.Bakken@lewisbrisbois.com>; Fox (LA), Dana <Dana.Fox@lewisbrisbois.com>; Irvin Aguirre <irvin.aguirre@bncllaw.com>; Julia Quesada <julia.quesada@bncllaw.com>; DeWitt Lacy <dewitt@bncllaw.com>; Medina, Christina <Christina.Medina@lewisbrisbois.com>  
**Subject:** [EXT] Re: [PC] Re: Lopez et al v City of Anaheim et al - Request to Meet and Confer re Modification of the Scheduling Order

As stated in my previous email, we are happy to consider alternative dates.

Re the mediation: Are you still amenable to Judge Biderman? If so, I will inquire as to his upcoming availability.

Regards,

Lena P. Andrews

*Attorney*

<~WRD0000.jpg>

**Burris, Nisenbaum, Curry and Lacy LLP**

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On Fri, Apr 26, 2024 at 11:56 AM Sain, Tony <[Tony.Sain@lewisbrisbois.com](mailto:Tony.Sain@lewisbrisbois.com)> wrote:

Dear Counsel:

The current stipulation does not work for defendants. Ms. McLaughlin is trying to find a defense-workable alternative. However, as she previously advised, that requires a lot of scheduling coordination, since you also want to move the trial date.

Additionally, defendants cannot agree to any continuances unless and until the mediation has been rescheduled.

Ms. McLaughlin will get back to you as soon as feasible. Thanks!

Respectfully,

Tony M. Sain, Esq., Partner Of

**LEWIS, BRISBOIS, BISGAARD & SMITH LLP**

633 West 5<sup>th</sup> Street, Suite 4000

Los Angeles, CA 90071

213.250.1800 (main)

[Tony.Sain@lewisbrisbois.com](mailto:Tony.Sain@lewisbrisbois.com)

<https://lewisbrisbois.com/attorneys/sain-tony-m> #1461

---

**From:** Lena Andrews <[lena.andrews@bncllaw.com](mailto:lena.andrews@bncllaw.com)>  
**Sent:** Friday, April 26, 2024 11:20 AM  
**To:** McLaughlin, Abigail <[Abigail.McLaughlin@lewisbrisbois.com](mailto:Abigail.McLaughlin@lewisbrisbois.com)>  
**Cc:** Gregg Audet <[gaudet@anaheim.net](mailto:gaudet@anaheim.net)>; Bakken, Tori <[Tori.Bakken@lewisbrisbois.com](mailto:Tori.Bakken@lewisbrisbois.com)>; Fox (LA), Dana <[Dana.Fox@lewisbrisbois.com](mailto:Dana.Fox@lewisbrisbois.com)>; Sain, Tony <[Tony.Sain@lewisbrisbois.com](mailto:Tony.Sain@lewisbrisbois.com)>; Irvin Aguirre <[irvin.aguirre@bncllaw.com](mailto:irvin.aguirre@bncllaw.com)>; Julia Quesada <[julia.quesada@bncllaw.com](mailto:julia.quesada@bncllaw.com)>; DeWitt Lacy <[dewitt@bncllaw.com](mailto:dewitt@bncllaw.com)>  
**Subject:** Re: [EXT] Re: Lopez et al v City of Anaheim et al - Request to Meet and Confer re Modification of the Scheduling Order

Good morning:

I am following up on Defendants' position on the stipulation. Please advise.

Regards,

Lena P. Andrews

*Attorney*

<~WRD0000.jpg>

**Burriss, Nisenbaum, Curry and Lacy LLP**

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On Tue, Apr 23, 2024 at 8:13 PM Lena Andrews <[lena.andrews@bncllaw.com](mailto:lena.andrews@bncllaw.com)> wrote:

Ms. McLaughlin:

A draft stipulation is attached. The dates reflect a 60 day continuance. If the proposed trial date does not work for your office, please suggest alternative dates and we would be happy to consider them.

Please use track changes for any suggested revisions.

Regards,

Lena P. Andrews

Attorney

<~WRD0000.jpg>

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On Mon, Apr 22, 2024 at 11:58 AM McLaughlin, Abigail <[Abigail.McLaughlin@lewisbrisbois.com](mailto:Abigail.McLaughlin@lewisbrisbois.com)> wrote:

Ms. Andrews:

As you know, counsel on this matter are also currently engaged in trial on the Nunis matter. We are discussing the continuance and will get back to you as soon as we can, given the May 10, 2024 fact discovery cut-off. It may be easier to assess if you could circulate a stipulation with proposed dates – that way we are able to see if such comports with our trial schedule in other matters.

Thank you,

Abigail

<image001.png>

Abigail J. R. McLaughlin (She/Her/Hers)

Partner

[Abigail.McLaughlin@lewisbrisbois.com](mailto:Abigail.McLaughlin@lewisbrisbois.com)

T: 213.358.6001 F: 213.250.7900

633 W. 5th Street, Suite 4000, Los Angeles, CA 90071 | [LewisBrisbois.com](http://LewisBrisbois.com)

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<image002.png>

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**From:** Lena Andrews <[lena.andrews@bncllaw.com](mailto:lena.andrews@bncllaw.com)>

**Sent:** Monday, April 22, 2024 11:53 AM

**To:** Gregg Audet <[gaudet@anaheim.net](mailto:gaudet@anaheim.net)>; Bakken, Tori <[Tori.Bakken@lewisbrisbois.com](mailto:Tori.Bakken@lewisbrisbois.com)>; Fox (LA), Dana <[Dana.Fox@lewisbrisbois.com](mailto:Dana.Fox@lewisbrisbois.com)>; McLaughlin, Abigail <[Abigail.McLaughlin@lewisbrisbois.com](mailto:Abigail.McLaughlin@lewisbrisbois.com)>; Sain, Tony <[Tony.Sain@lewisbrisbois.com](mailto:Tony.Sain@lewisbrisbois.com)>

**Cc:** Irvin Aguirre <[irvin.aguirre@bncllaw.com](mailto:irvin.aguirre@bncllaw.com)>; Julia Quesada <[julia.quesada@bncllaw.com](mailto:julia.quesada@bncllaw.com)>; DeWitt Lacy <[dewitt@bncllaw.com](mailto:dewitt@bncllaw.com)>

**Subject:** [EXT] Re: Lopez et al v City of Anaheim et al - Request to Meet and Confer re Modification of the Scheduling Order



Counsel:

I am following up on my email from Thursday. Please advise as to your position on a stipulation to continue.

Regards,

Lena P. Andrews

*Attorney*

<~WRD0000.jpg>

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On Apr 18, 2024, at 12:04 PM, Lena Andrews <[lena.andrews@bnclaw.com](mailto:lena.andrews@bnclaw.com)> wrote:

Counsel:

I am writing to request that we meet and confer regarding a stipulation to modify the scheduling order in the *Lopez* matter.

As you well know, the Nunis trial is currently ongoing and will last until at least the beginning of May with jury deliberations. Currently, the fact discovery cutoff for Lopez is May 10, 2024. As you know, we previously had a mediation scheduled but due to obligations with her employer, Plaintiffs were not able to attend. Plaintiffs remain interested in engaging in additional settlement discussions and I believe it would be prudent to extend all deadlines in this matter to allow for additional time for those settlement discussions prior to the parties expending additional costs on the case in taking more depositions and hiring experts.

Furthermore, the current trial date in this case (September 17, 2024), ordered by the Court in response to Defendants' Motion to Continue, conflicts with a trial in another matter that was set prior to the Court's order in this matter. That trial is very likely to move forward, necessitating a continuance of this trial.

We would request a sixty day continuance of all deadlines to allow time for the parties to find a mutually convenient date for a mediation and to address the conflict with the trial date. Please advise if you are willing to stipulate to a continuance and I will prepare a stipulation.

Thank you in advance for your anticipated professional courtesy.

Regards,

Lena P. Andrews

*Attorney*

<~WRD0000.jpg>

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**Lena Andrews** <[lena.andrews@bnclaw.com](mailto:lena.andrews@bnclaw.com)>

Thu, May 2, 2024 at 1:37 PM

To: "Bakken, Tori" <[Tori.Bakken@lewisbrisbois.com](mailto:Tori.Bakken@lewisbrisbois.com)>

Cc: "Sain, Tony" <[Tony.Sain@lewisbrisbois.com](mailto:Tony.Sain@lewisbrisbois.com)>, "McLaughlin, Abigail" <[Abigail.McLaughlin@lewisbrisbois.com](mailto:Abigail.McLaughlin@lewisbrisbois.com)>, Irvin Aguirre <[irvin.aguirre@bnclaw.com](mailto:irvin.aguirre@bnclaw.com)>, Gregg Audet <[GAudet@anaheim.net](mailto:GAudet@anaheim.net)>, Julia Quesada <[julia.quesada@bnclaw.com](mailto:julia.quesada@bnclaw.com)>, DeWitt Lacy <[dewitt@bnclaw.com](mailto:dewitt@bnclaw.com)>, "Medina, Christina" <[Christina.Medina@lewisbrisbois.com](mailto:Christina.Medina@lewisbrisbois.com)>, "Arabyan, Lilit" <[Lilit.Arabyan@lewisbrisbois.com](mailto:Lilit.Arabyan@lewisbrisbois.com)>

I just spoke with Judge Biderman and my clients and we are confirmed for a half-day on May 14.

Please advise regarding the trial date or use track changes to edit the draft stipulation circulated earlier.

Regards,

Lena P. Andrews

*Attorney*



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[Quoted text hidden]

**Lena Andrews** <lena.andrews@bncllaw.com>

Fri, May 3, 2024 at 3:00 PM

To: "Bakken, Tori" <Tori.Bakken@lewisbrisbois.com>

Cc: "Sain, Tony" <Tony.Sain@lewisbrisbois.com>, "McLaughlin, Abigail" <Abigail.McLaughlin@lewisbrisbois.com>, Irvin Aguirre <irvin.aguirre@bnclaw.com>, Gregg Audet <GAudet@anaheim.net>, Julia Quesada <julia.quesada@bnclaw.com>, DeWitt Lacy <dewitt@bnclaw.com>, "Medina, Christina" <Christina.Medina@lewisbrisbois.com>, "Arabvan, Lilit" <Lilit.Arabvan@lewisbrisbois.com>

Counsel:

The notice of continued mediation is attached. Please advise regarding the trial date in June so that we may finalize the stipulation given the impending discovery cut off.

5/7/24, 1:02 PM  
Regards,

Lena P. Andrews  
*Attorney*



**Burris, Nisenbaum, Curry and Lacy LLP**

9701 Wilshire Blvd., Suite 1000

Beverly Hills, CA 90212

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**Notice of Continued Mediation to 5.14.24.docx**  
22K